

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Defendant.

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Adv. No. 19-00200(MDC)

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEBTOR/DEFENDANT JAMES
FITZGERALD BOWYER'S MOTION TO DISMISS
PLAINTIFFS' ADVERSARY COMPLAINT**

Plaintiffs, The Kim Law Firm, LLC (“KLF”) and Richard Kim (“RK”, collectively with “KLF” are the “Plaintiffs”), by and through the undersigned counsel, hereby respond to Debtor/Defendant James Fitzgerald Bowyer’s (“Defendant” or “Bowyer”) Motion to Dismiss (“Def.’s Motion”) Plaintiff’s Complaint (the “Complaint”). Plaintiffs offer their Response, more comprehensively set forth in the attached Memorandum of Law, and incorporate the same in support thereof.

Respectfully submitted,

OFFIT KURMAN, P.A.

By: /s/Ryan N. Boland

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Dated: December 2, 2019